

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054 (DTS)

Plaintiff,

v.

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

**DECLARATION OF LEAH
GODESKY IN SUPPORT OF
DEFENDANTS' MEMORANDUM IN
OPPOSITION TO PLAINTIFF'S
MOTION IN LIMINE NO. 5**

Defendants.

I, Leah Godesky, declare as follows:

1. I am an attorney at O'Melveny & Myers LLP and am one of the attorneys representing Defendants Federal Insurance Company and ACE American Insurance Company (collectively, "Federal") in this case.

2. Attached as **Exhibit 1** is a true and correct copy of excerpts of the May 8, 2019, Hearing transcript.

3. Attached as **Exhibit 2** is a true and correct copy of the Notice of Rule 30(b)(6) deposition, dated April 11, 2018.

4. Attached as **Exhibit 3** is a true and correct copy of the Amended Second Notice of Rule 30(b)(6) deposition, dated December 31, 2018.

5. Attached as **Exhibit 4** is a true and correct copy of the Amended Third Notice of Rule 30(b)(6) deposition, dated March 19, 2019.

6. Attached as **Exhibit 5** is a true and correct copy of excerpts of the Claudio Ghislanzoni deposition transcript taken on March 12, 2020.

7. Attached as **Exhibit 6** is a true and correct copy of the September 7, 2016, Ramesh Pandey email regarding BRE Deployment Model Cost Estimates, marked as D-0166 on Defendants' exhibit list.

8. Attached as **Exhibit 7** is a true and correct copy of the April 1, 2015, Oliver Clark email regarding Decision Simulator Proposal, marked as D-0120 on Defendants' exhibit list.

9. Attached as **Exhibit 8** is a true and correct copy of the September 12, 2007, Ewen Setti email regarding Blaze, marked as D-0061 on Defendants' exhibit list.

10. Attached as **Exhibit 9** is a true and correct copy of the March 25, 2015, Hamish Tonkin email regarding Licenses, marked as D-0115 on Defendants' exhibit list.

11. Attached as **Exhibit 10** is a true and correct copy of the December 5, 2012, Calendar Entry Notice of a meeting with Russell Schreiber – FICO Global VP for Insurance, marked as D-0087 on Defendants' exhibit list.

12. Attached as **Exhibit 11** is a true and correct copy of the March 23, 2015, Calendar Entry Notice of a meeting regarding Blaze Advisor, marked as D-0113 on Defendants' exhibit list.

13. Attached as **Exhibit 12** is a true and correct copy of excerpts of the Kevin Harkin deposition transcript taken on March 25, 2019.

14. Attached as **Exhibit 13** is a true and correct copy of Federal Insurance Company's Supplemental Answers to Plaintiff's First Set of Interrogatories, dated June 15, 2017.

15. Attached as **Exhibit 14** is a true and correct copy of excerpts of the Ramesh Pandey deposition transcript taken on November 13, 2018.

16. Attached as **Exhibit 15** is a true and correct copy of the September 8, 2016, Architecture Council PowerPoint, marked as D-0134 on Defendants' exhibit list.

17. Attached as **Exhibit 16** is a true and correct copy of the March 3, 2016, Ramesh Pandey email regarding ODM vs Blaze, produced during litigation with bates number FED000690_0001.

18. Attached as **Exhibit 17** is a true and correct copy of the March 3, 2016, Ramesh Pandey email regarding ODM vs. Blaze, produced during litigation with bates number FED000700_0001-0003.

19. Attached as **Exhibit 18** is a true and correct copy of the April 4, 2016, Ramesh Pandey email regarding Urgent – NA Arch, produced during litigation with bates number FED001118_0001.

20. Attached as **Exhibit 19** is a true and correct copy of excerpts of the Tamra Pawloski deposition transcript taken on January 18, 2019.

21. Attached as **Exhibit 20** is a true and correct copy of excerpts of the Billy McCarter deposition transcript taken on June 5, 2019.

22. Attached as **Exhibit 21** is a true and correct copy of excerpts of the Michael Schraer deposition transcript taken on February 26, 2020.

23. Attached as **Exhibit 22** is a true and correct copy of excerpts of the Alissa Theberge deposition transcript taken on April 29, 2020.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: January 27, 2023

s/ Leah Godesky
Leah Godesky

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